

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 2:22-cr-20504

Honorable Jonathan J.C. Grey

Aws Mohammed Naser,

Defendant.

First Forfeiture Bill of Particulars

The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Second Superseding Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Second Superseding Indictment are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a), 18 U.S.C. § 924(d)(1), 981(a)(1)(G) and 28 U.S.C. § 2461(c).

As a result of violating the offenses set forth in Count One of the Second Superseding Indictment, Aws Mohammed Naser shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(G) together with 28 U.S.C. § 2461(c):

- i. All assets, foreign or domestic, of the defendant, as an individual, entity, or organization engaged in planning or perpetrating a federal crime of terrorism against the United States, citizens or residents of the United States, citizens or residents of the United States, or their property, and all assets, foreign or domestic, affording the defendant a source of influence over any such entity or organization;
- ii. All assets, foreign or domestic, acquired or maintained by the defendant with the intent and for the purpose of supporting, planning, conducting, or concealing his Count One offense;
- iii. All assets, foreign or domestic, derived from, involved in, or used or intended to be used to commit his Count One offense.

As a result of violating the offenses set forth in Count Two of the Second Superseding Indictment, Aws Mohammed Naser shall forfeit to the United States, pursuant to 18 U.S.C. § 922(g)(1), his interest in any firearm or ammunition involved in the offense.

Such property to be forfeited, includes, but is not limited to the following:

- Drift HD 1080P camera with mountable parts and one (1) Sony Pro memory stick;

- One (1) box of CO2 cartridges (missing one cartridge);
- One (1) plastic container of Copperhead BBs;
- One (1) metal container of hunting pellets;
- Vipertek purple stun gun;
- One (1) round of CCLA .38 Special ammunition;
- Cold Steel Recon 1 knife;
- Two (2) Guidesman 2-way radios, one (1) Stanley hacksaw, one hundred (100) Mini-Christmas tree lights, one (1) Stanley glue gun, glue sticks, sandpaper, wires, electronic component and wire kits, used-latex gloves, and 10ml syringe;
- Sony IC Digital Voice Recorder, Model: ICD-PX820;
- X-ACTO Hobby Set in black case containing three (3) X-ACTO knives and ten (10) blades;
- Black light;
- Trench style knife with knuckle guard and sheath;
- K-Bar style knife with sheath;
- Tarot drone frame;
- Black cane with sword inside and an unknown black substance on sword blade;
- Cold Steel, Voyager, Extra-large Tanto Point, Plain Edge Knife;
- Aurora 90 micro FPV Racing Drone, five (5) remote controls, and miscellaneous cords, battery chargers, and instruction manuals;
- Twenty (20) BBs from Smith & Wesson BB gun;
- Smith & Wesson, .177 caliber BB gun, S/N: 16A25727, with magazine;
- One (1) Syma drone remote, one (1) Syma battery, one (1) portable pocket scale, and miscellaneous drone accessories, parts, tools, and wires; and
- One (1) drone, four (4) drone blades, three (3) drone battery packs, one (1) container of soldering lead, one (1) soldering gun, and miscellaneous drone accessories, parts, tools, and wires.

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of a forfeiture money judgment.

//

//

Respectfully submitted,

Dawn N. Ison
United States Attorney

S/Gjon Juncaj
Gjon Juncaj (P63256)
Assistant U.S. Attorney
211 W. Fort Street, Ste. 2001
Detroit, Michigan 48226
(313) 226-0209
Gjon.Juncaj@usdoj.gov

Dated: August 6, 2024

Certification of Service

I hereby certify that on August 6, 2024, the foregoing document was electronically filed using the ECF system which will send notification of such filing to all ECF participants.

S/Gjon Juncaj
Gjon Juncaj (P63256)
Assistant U.S. Attorney
211 W. Fort Street, Ste. 2001
Detroit, Michigan 48226
(313) 226-0209
Gjon.Juncaj@usdoj.gov